## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS Dallas Division

CHARLENE CARTER,

Civil Case No. 3:17-cv-02278-S

Plaintiff,

JOINT STIPULATION TO PLAINTIFF'S FILING THE SECOND AMENDED COMPLAINT

v.

SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,

Defendants.

Pursuant to the Federal Rules of Civil Procedure, Rule 15(a)(2), Plaintiff Charlene Carter ("Carter"), Defendant Southwest Airlines Co. ("Southwest"), and Transport Workers Union of America, Local 556 ("Local 556"), through their counsel of record, hereby file this Stipulation to Plaintiff's filing the Second Amended Complaint, filed contemporaneously herewith and attached hereto as **Exhibit 1**.

Pursuant to Fed. R. Civ. P., Rule 15(a)(2), a party may amend its pleading with the opposing parties' written consent. Accordingly, the parties agree to Carter's filing of the Second Amended Complaint (Exhibit 1) attached hereto.

Date: June 25, 2018

Respectfully submitted,

By: s/ Jason Winford (with permission)

David E. Watkins

Texas Bar No. 20922000

dwatkins@jenkinswatkins.com

Jason E. Winford

Texas Bar No. 00788693

jwinford@jenkinswatkins.com

JENKINS & WATKINS, P.C.

By: s/ Thomas E. Reddin (with permission)

Thomas E. Reddin

Texas Bar No. 16660950

treddin@polsinelli.com

POLSINELLI PC

2950 N. Harwood Street, Suite 2100

Dallas, Texas 75201

Tel: 214-397-0030

4300 MacArthur Avenue, Ste. 165

Dallas, Texas 75209 Tel: 214-378-6675 Fax: 214-378-6680

By: s/ Matthew B. Gilliam

Matthew B. Gilliam (*pro hac vice*) New York Bar No. 5005996

mbg@nrtw.org

Jeffrey D. Jennings (pro hac vice)

Virginia Bar No. 87667

jdj@nrtw.org

c/o National Right to Work Legal Defense

Foundation, Inc.

8001 Braddock Road, Suite 600 Springfield, Virginia 22160

Tel: 703-321-8510 Fax: 703-321-9319

Attorneys for Plaintiff

Fax: 214-397-0033

By: s/ Michele Haydel Gehrke (with permission)

Michele Haydel Gehrke (pro hac vice)

California Bar No. 215647 mgehrke@polsinelli.com

POLSINELLI PC

Three Embarcadero, Suite 2400 San Francisco, CA 94111

Tel: 415-248-2100 Fax: 415-248-2101

Attorneys for Defendant Southwest Airlines Co.

By: Edward B. Cloutman, IV (with permission)

Edward B. Cloutman, IV Texas Bar No. 24074045 <u>edwardcloutman@gmail.com</u>

Adam S. Greenfield
Texas Bar No. 24075494

agreenfield@candglegal.com
LAW OFFICE OF CLOUTMAN
& GREENFIELD, P.L.L.C.
3301 Elm Street

Dallas, Texas 75226-1637

Tel: 214-939-9222 Fax: 214-939-9229

Attorneys for Defendant Transport Workers Union of America, Local 556 Case 3:17-cv-02278-X Document 46 Filed 06/25/18 Page 3 of 3 PageID 529

**CERTIFICATE OF SERVICE** 

I certify that, on this day, the foregoing was electronically filed with the Clerk of Court

by using the CM/ECF system, which will send a notice of electronic filing to all counsel of

record.

By: /s/ Matthew B. Gilliam

3